

EXHIBIT C

From: [Alexandra Conlon](#)
To: [Murphy, Lindsay M. \(CIV\)](#); [Strokus, Jessica D. \(CIV\)](#)
Cc: [Noam Biale](#); [Santora, Victoria M \(CIV\)](#); [Busen, Jesse \(CIV\)](#); [Xiangnong Wang](#); [Courtney Gans](#); [Jackson Busch](#); [Michael Tremonte](#); [Ramya Krishnan](#); [Scott Wilkens](#); [Talya R Nevins](#); [Alexander A Abdo](#); [Jameel Jaffer](#); [Kanter, Ethan \(CIV\)](#); [Stone, Paul \(CIV\)](#); [Hennes, Stefanie \(CIV\)](#); [Safavi, Nancy \(CIV\)](#); [Kanellis, William G. \(CIV\)](#); [Moss, Benjamin M. \(CIV\)](#); [Hockenberry, Tia \(CIV\)](#)
Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions
Date: Monday, June 30, 2025 12:03:20 PM

Lindsey,

We have come to D.C. and arranged a conference room, and a court reporter and videographer for tomorrow, after the government repeatedly indicated that Ms. Norris could not be deposed for all (or even part) of July 3. Multiple lawyers have traveled from NYC to D.C. because the government insisted on deposing Mr. Reger and Ms. Norris simultaneously. We want to depose her starting tomorrow, and to finish the balance of her deposition on Thursday. Because we can do this in two parts, we want to start at 9AM tomorrow, instead of 8AM, which would require administrative staff at the location hosting us to come in earlier than they ordinarily do just to accommodate us. We will see you at 9AM tomorrow at Jenner & Block unless we hear otherwise. Please let us know who will be in attendance.

Relatedly, we noticed depositions for Maureen Smith and three ASAC witnesses for this week. You have not provided us with their availability or alternative dates and times for their depositions. When can we expect a response from you about the availability of the deponents in Boston, NYC, and D.C.?

Thanks,
 Alex



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From: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>
Sent: Monday, June 30, 2025 10:07 AM
To: Alexandra Conlon <Aconlon@shertremonte.com>; Strokus, Jessica D. (CIV)
<Jessica.D.Strokus@usdoj.gov>
Cc: Noam Biale <NBiale@shertremonte.com>; Santora, Victoria M (CIV)
<Victoria.M.Santora@usdoj.gov>; Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Xiangnong Wang
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A Abdo <alex.abdo@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>;
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Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Safavi, Nancy (CIV)
<Nancy.Safavi@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Moss,
Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Hockenberry, Tia (CIV)
<Tia.Hockenberry@usdoj.gov>
Subject: RE: [EXTERNAL] Re: Scheduling remaining depositions



Hi everyone,

We just learned that Ms. Norris is now available to sit for her whole deposition on Thursday, 7/3. Could we plan on scheduling her for the full day Thursday rather than dividing things up between Tuesday and Thursday?

Thanks,
Lindsay

From: Alexandra Conlon <Aconlon@shertremonte.com>
Sent: Sunday, June 29, 2025 11:30 PM
To: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>
Cc: Noam Biale <NBiale@shertremonte.com>; Santora, Victoria M (CIV)
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<Nancy.Safavi@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Moss,

Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Hockenberry, Tia (CIV)
<Tia.Hockenberry@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

For Mr. Reger's deposition, Noam, George, and I will be in attendance. Since I will be coming from Ms. Norris's deposition, I will be late.

Mr. Reger cannot get to the location you noticed for his deposition until 10:30AM on 7/1. He will be there then.

For Ms. Norris's deposition, please send us the names of the team you expect to bring so we can give them to security.

Finally, we continue to wait for your response regarding when Ms. Norris will be available to complete her deposition, and when the other witnesses we noticed will be available.

Thanks,
Alex

<p>photo</p> 	<p>Alexandra Conlon (she/her) Sher Tremonte LLP</p> <p>90 Broad Street, 23rd Floor New York, NY 10004 aconlon@shertremonte.com tel: 212.540.0677 fax: 212.202.4156 www.shertremonte.com</p> <p>  </p>
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From: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>
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Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

Alex,

This plan does not work for us. We intend for the depositions to be conducted simultaneously. Relatedly, as Mr. Reger's deposition will be conducted at a secure government building, please let us know who will be in attendance. Individuals who are not identified will not be permitted to enter the building.

Thank you,
Jessica

Sent from my iPhone

On Jun 29, 2025, at 7:24 PM, Alexandra Conlon

<Aconlon@shertremonte.com> wrote:

Following up on this, we propose beginning Mr. Rieger's deposition at the close of Ms. Norris's on 7/1, around 1:30 or 2:00PM. We also suggest that Mr. Rieger's deposition take place at the same location as Ms. Norris's, so that the teams taking/defending Norris can stay put for Rieger. Please let us know if that works on your end.

photo



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Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Xiangnong Wang <george.wang@knightcolumbia.org>; Courtney Gans <CGans@shertremonte.com>; Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Jackson Busch <jackson.busch@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Safavi, Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Hockenberry, Tia (CIV) <Tia.Hockenberry@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

Confirming that we will begin deposing Norris on 7/1 at 8 AM. We can use the rest of our time on 7/3 – please let us know when she is available.

Also, please get back to us **today** with availability for Maureen Smith and the ICE agents we noticed.

Thanks.

<image001.jpg> **Noam Biale**
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<image002.jpg>

<image003.jpg>

<image004.jpg>

From: Noam Biale <NBiale@shertremonte.com>
Date: Saturday, June 28, 2025 at 4:19 PM
To: Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>
Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>, Xiangnong Wang <george.wang@knightcolumbia.org>, Courtney Gans <CGans@shertremonte.com>, Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>, Jackson Busch <jackson.busch@knightcolumbia.org>, Michael Tremonte <MTremonte@shertremonte.com>, Ramya Krishnan <ramya.krishnan@knightcolumbia.org>, Scott Wilkens <scott.wilkens@knightcolumbia.org>, Talya R Nevins <talya.nevins@knightcolumbia.org>, Alexander A Abdo <alex.abdo@knightcolumbia.org>, Alexandra Conlon <Aconlon@shertremonte.com>, Jameel Jaffer <jameel.jaffer@knightcolumbia.org>, Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>, Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>, Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>, Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>, Safavi, Nancy (CIV) <Nancy.Safavi@usdoj.gov>, Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>, Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>, Hockenberry, Tia (CIV) <Tia.Hockenberry@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

What is her window on 7/3?

<Image.jpeg> **Noam Biale**
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Sent: Saturday, June 28, 2025 4:13:30 PM
To: Noam Biale <NBiale@shertremonte.com>
Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Xiangnong Wang

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Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

Her availability has changed, and she's no longer available for the entirety of either day.

Sent from my iPhone

On Jun 28, 2025, at 2:49 PM, Noam Biale <NBiale@shertremonte.com> wrote:

Victoria,

You had advised that Ms. Norris was available without a time limitation on July 3. We would like to do the entirety of her deposition that day. Please confirm.

Noam

<Image.jpeg>

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From: Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>
Sent: Saturday, June 28, 2025 3:23:26 PM
To: Noam Biale <NBiale@shertremonte.com>
Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Xiangnong Wang <george.wang@knightcolumbia.org>; Courtney Gans <CGans@shertremonte.com>; Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Jackson Busch <jackson.busch@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Safavi, Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Hockenberry, Tia (CIV) <Tia.Hockenberry@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Scheduling remaining depositions

Hi Noam,

Ms. Norris will be available on Tuesday, 7/1, from 8 am - 1 pm, and her deposition may be continued, if necessary, on a later date, potentially 7/3. We are still confirming availability with other witnesses, but we do know no one will be available on Monday, 6/30.

In addition to Mr. Rieger and Ms. Al-Ali, who are already noticed, we'll notice Ms. Abu El-Haj for a remote deposition on Friday, 7/4, beginning at 6 am ET. And we'd like to notice Ms. Arruzza for a remote deposition on Tuesday, 7/1, beginning at 9 am ET. I'll send those two notices later today.

Victoria

Sent from my iPhone

On Jun 28, 2025, at 1:39 PM, Noam Biale

<NBiale@shertremonte.com> wrote:

◆◆◆ Following up on this. We would like to know if we will be able to conduct the deposition on Monday in Boston. Please respond as soon as you have any information. Thank you.

<Image.jpeg>

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From: Noam Biale

Sent: Friday, June 27, 2025 4:53:10 PM

To: 'Busen, Jesse (CIV)' <Jesse.Busen@usdoj.gov>;

Xiangnong Wang; Courtney Gans

<CGans@shertremonte.com>; Murphy, Lindsay M. (CIV)

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Wilkens; Talya R Nevins; Alexander A Abdo; Alexandra

Conlon <Aconlon@shertremonte.com>

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Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D.

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<Tia.Hockenberry@usdoj.gov>

Subject: Scheduling remaining depositions

Good afternoon,

We are writing to confirm and notice the final remaining depositions before trial and to discuss scheduling the trial testimony of Pete Hatch and John Armstrong.

Plaintiffs' Witnesses

You have noticed depositions for Jeff Rieger, Nadjia Al-Ali, and Nadia Abu El-Haj. We can confirm Jeff Rieger on 7/1 in D.C. and Nadjia Al-Ali on 7/2 in Boston.

Regarding Nadia Abu El-Haj, you requested 7/4, which we asked to modify, but we can make your original date work—we just ask to begin very early that day (like 6AM) because she is in Beirut, which is seven hours ahead.

Defendants' Witnesses

We have noticed Jessica Norris and understand she is available for the full day on 7/3. Please confirm that we are set to depose her on the 3rd, as discussed.

We now additionally notice depositions for following persons identified in Mr. Hatch's deposition and in the government's pretrial memo on the following dates:

- ASAC Crogan **or** Cunningham in Boston anytime on Monday 6/30 and Wednesday 7/2 (we will take whoever is available on either day, and we can start on anytime on 6/30. For 7/2, we would start after Ms. Al-Ali).
- DSAC McCormack – 7/1 in New York, anytime (we could also do it on 7/3 if that does not work)
- Maureen Smith in D.C. on 7/2 (we can

accommodate alternate dates if needed).

Please confirm the dates and times for the depositions that have already been arranged, and please let us know as soon as you are able about the depositions we are noticing now.

Scheduling of Witnesses for Trial

We intend to call Pete Hatch at trial on **Wednesday, 7/9**. Please confirm you will make him available that day.

With respect to John Armstrong, since you have indicated you are calling him as a defense witness at trial, we will take him off of our witness list. Please confirm that you will call him in the defense case (an, obviously, it will be up to you when to call him).

Thanks,
Noam

<image001.jpg>

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<image002.jpg>

<image003.jpg>

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Sent: Friday, June 27, 2025 4:06 PM

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Subject: RE: AAUP - Motion to seal

Thanks, Noam.

On the joint motion to seal, I will get back to you as soon as I have an answer.

Jesse

From: Noam Biale <NBiale@shertremonte.com>
Sent: Friday, June 27, 2025 4:04 PM
To: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Xiangnong Wang <george.wang@knightcolumbia.org>; Courtney Gans <CGans@shertremonte.com>; Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Jackson Busch <jackson.busch@knightcolumbia.org>; jameel.jaffer <jameel.jaffer@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon

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Subject: [EXTERNAL] RE: AAUP - Motion to seal

Hi Jesse,

That's fine. On the question of filing under seal, could you also respond to my previous email about the pretrial briefs?

Thanks,

Noam

<image001.jpg>

Noam Biale

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<image002.jpg>

<image003.jpg>

<image004.jpg>

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From: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>

Sent: Friday, June 27, 2025 4:01 PM

To: Noam Biale <NBiale@shertremonte.com>; Xiangnong Wang <george.wang@knightcolumbia.org>; Courtney Gans <CGans@shertremonte.com>; Murphy, Lindsay M. (CIV)

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Subject: AAUP - Motion to seal

Noam and all,

We plan to file the entirety of the Armstrong depo transcript as an exhibit to our response to the motion to compel this evening. Because it is marked confidential, we will be filing it under seal. Do you have any opposition to this?

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